

COOLEY LLP  
BENEDICT Y. HUR (224018)  
(bhur@cooley.com)  
SIMONA AGNOLUCCI (246943)  
(sagnolucci@cooley.com)  
EDUARDO E. SANTACANA (281668)  
(esantacana@cooley.com)  
ARGEMIRA FLÓREZ (331153)  
(aflorez@cooley.com)  
HARRIS MATEEN (335593)  
(hmateen@cooley.com)  
ISABELLA MCKINLEY CORBO (346226)  
(icorbo@cooley.com)  
3 Embarcadero Center, 20th Floor  
San Francisco, California 94111-4004  
Telephone: +1 415 693 2000  
Facsimile: +1 415 693 2222

Attorneys for Defendant  
Google LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**[PROPOSED] ORDER GRANTING MOTION  
TO FILE UNDER SEAL EXHIBITS B, C, H, I,  
J, P, Q, & R TO THE OMNIBUS  
DECLARATION OF EDUARDO SANTACANA**

Judge: Hon. Richard Seeborg  
Courtroom: 3, 17th Floor  
Action Filed: July 14, 2020  
Trial Date: August 18, 2025

**[PROPOSED] ORDER**

Before the Court is Google LLC's Statement in Support of Motion to Seal Portions of the Omnibus Declaration of Eduardo E. Santacana in support of Google's Motions in Limine Nos. 1-12 ("MILs") and documents filed in connection with that motion.

<b>Exhibit</b>	<b>Bates No./Pages with Designations</b>	<b>Description</b>
Exhibit B	GOOG-RDGZ-00014927, GOOG-RDGZ-00014928	Employee PII
Exhibit C	GOOG-RDGZ-00014578, GOOG-RDGZ-00014579	Employee PII
Exhibit H	Entire document	Internal metrics
Exhibit I	Entire document	Internal metrics; financial data
Exhibit J	GOOG-RDGZ-00150939, GOOG-RDGZ-00150940, GOOG-RDGZ-00150941	Employee PII
Exhibit P	GOOG-RDGZ-00018356, GOOG-RDGZ-00018358, GOOG-RDGZ-00018360, GOOG-RDGZ-00018371, GOOG-RDGZ-00018387, GOOG-RDGZ-00018389, GOOG-RDGZ-00018391, GOOG-RDGZ-00018397, GOOG-RDGZ-00018400, GOOG-RDGZ-00018401,	Competitively sensitive internal data; Employee PII

1		GOOG-RDGZ-00018402,	
2		GOOG-RDGZ-00018403,	
3		GOOG-RDGZ-00018404,	
4		GOOG-RDGZ-00018405,	
5		GOOG-RDGZ-00018406,	
6		GOOG-RDGZ-00018407,	
7		GOOG-RDGZ-00018408	
8			
9	Exhibit Q	GOOG-RDGZ-00090067,	Competitively sensitive internal
10		GOOG-RDGZ-00090068,	data;
11		GOOG-RDGZ-00090074,	Employee PII
12		GOOG-RDGZ-00090075,	
13		GOOG-RDGZ-00090078,	
14		GOOG-RDGZ-00090080,	
15		GOOG-RDGZ-00090081,	
16		GOOG-RDGZ-00090082,	
17		GOOG-RDGZ-00090083,	
18		GOOG-RDGZ-00090084,	
19		GOOG-RDGZ-00090086,	
20		GOOG-RDGZ-00090087,	
21		GOOG-RDGZ-00090090,	
22		GOOG-RDGZ-00090092,	
23		GOOG-RDGZ-00090095,	
24		GOOG-RDGZ-00090096,	
25		GOOG-RDGZ-00090097,	
26		GOOG-RDGZ-00090098,	
27		GOOG-RDGZ-00090099,	
28		GOOG-RDGZ-00090100,	

1		GOOG-RDGZ-00090101,	
2		GOOG-RDGZ-00090102	
3			
4	Exhibit R	Pg. 100	Internal project name Ec***

5  
6 Having considered Google's Statement in Support of Motion to Seal Portions of Motions  
7 in Limine and the Declaration of Eduardo E. Santacana, it is hereby ORDERED that the motion is  
8 GRANTED and that compelling reasons justify the sealing of the following documents:

- 9 1. Highlighted portions of Exhibits B, C, J, P, Q, and R to the Omnibus Declaration of
- 10 Eduardo E. Santacana ("Omnibus Santacana Declaration").
- 11 2. The entirety of Exhibits H and I to the Omnibus Santacana Declaration.

12 IT IS SO ORDERED.

13  
14 DATED: \_\_\_\_\_

\_\_\_\_\_  
Honorable Richard Seeborg  
United States District Judge